



Cynthia Bailey, President

CX Systems Int'l, Inc.

P. O. Box 3452, Plant City, FL 33564-3452

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M. A. Hepburn, Vice President

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• International Business Market Analysts • World Trade Research Consultants • Import & Export, Etc.

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December 10, 1997

The Honorable Secretary Magalie Roman Salas
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

RE: **PETITION FOR RECONSIDERATION (WT Docket 97-82)**

Please find attached our Petition For Reconsideration to the Second Report and Order for an Amendment of the Commissioners' Rules Regarding Installment Payment Financing for the PCS Licensees to (WT Docket 97-82), which we incorrectly filed with you on December 1, 1997.

We respectfully submit our Petition for filing for FCC consideration.

Sincerely,

Cynthia R. Bailey
President

M.A. Hepburn
Vice President

Attachment

cc: The Honorable William Kennard, Chairman

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M. A. Hepburn, Vice President

December 1, 1997

The Honorable William Kennard, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

RE: PETITION FOR RECONSIDERATION

Dear Honorable Chairman:

CX Systems Int'l, Inc., is a small minority owned and operated business in Florida with a contract as a reseller of PCS wireless airtime. We were active in the restructuring proceeding throughout the summer, hoping the Commission would develop an economically viable solution for the C-block licensees. We feel the C-block allows the only opportunity in the telecommunications industry which allows small businesses, such as ours, a fair opportunity to compete in the wireless telecommunications industry.

We feel the FCC's restructuring options in their present format attach needless punitive penalties to the C-block licensees. Such punitive penalties will only hurt network buildout and the introduction of the much needed competition in our industry and to the American people. We feel the Commission failed to take into account proposals from Congressman Tauzin and Markey and others calling for a non-punitive solution for the C-block licensees.

CX Systems hopes the new Commission will review the previous decision and conclude that the C-block represent a major part of the unfinished business of the Telecommunication Act of 1996. Offering C-block licensees economical options best achieves the paramount policy objective of the Administration and Congress to create facilities-based competition as quickly as possible.

The C-block companies provide many highly qualified small and minority businesses an opportunity to survive and compete in a market which, historically, has been closed to the incumbents far too long. We respectfully request the FCC to:

- Allow C-block licensees to utilize their full down-payment in the desegregation and prepayment options; and
- Adjust the prepayment option to reflect the net present value of the foregoing installment payments.

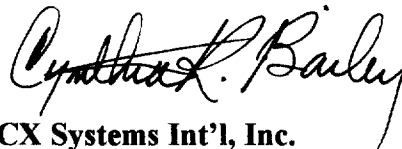
The Honorable William Kennard, Chairman
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December 1, 1997
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We look forward to you and the Commissioners providing viable options to the C-block licensees allowing them to provide a fair market right here in the U.S.A. The incumbents in the wireless telecommunications industry are trying to keep highly qualified competitors out of the markets by using their powerful influence. The time is now to adjust market conditions at home in the U.S.A. to allow equal rights to a market that has been monopolized by the incumbents for far too long. How can we expect overseas markets to be open and fair to our country, when we need to make our own telecommunications market open and fair?

Your goals as FCC Commissioners are to make sure that we have open and fair competition in the markets, and provide an avenue that is fair to the Entrepreneurs block companies, so they may compete fairly in our markets at home.

Your consideration in this matter will be greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia L. Bailey". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

CX Systems Int'l, Inc.
Board of Directors

KD:CRB

cc: The Honorable Michael Powell
The Honorable Harold Furchtgott-Roth
The Honorable Gloria Tristani
The Honorable Susan Ness
Ms. Magalie Roman Salas, Secretary